



**U.S. Department of Justice**

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VIA Electronic Mail

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Re: United States v. Gregg A. Bigda  
Crim. No. 18-CR-30051-MGM

Dear Counsel:

Please find enclosed discovery in the above-referenced case labeled with Bates numbers US015591 through US015671. Certain of these documents are marked as Sensitive Discovery Materials and are produced pursuant to the court-ordered protective order (Doc. No. 29).

In the Court's Procedural Order (Doc. No. 156), entered March 5, 2020, the Court ordered the parties "to disclose any expert witnesses they plan to call" by March 13, 2020. On that date, the government filed its Notice of Expert Witnesses (Doc. No. 157). At this time, the government does not intend to call as trial witnesses in its case-in-chief any further experts beyond those listed in its March 13, 2020 disclosure.

The Court's Procedural Order provided, in addition, that any request for "a written summary of [expert] testimony," pursuant to Rule 16(a)(1)(G) "shall be made by Friday, March 20, 2020." The government never received a request from the defense for a written summary of the anticipated expert testimony, but nevertheless hereby provides the expert report of Dr. Richard Leo. Please note that Dr. Leo wrote this report before the Court ruled on the defendant's Motion in Limine to Exclude and/or Limit the Government's Expert Witnesses (Doc. Nos. 166, 181, 213). At trial, the government intends to present only the testimony of Dr. Leo that is permitted by the Court's order.

We have also produced via USAFx a word-searchable production log of all discovery produced to date. If you have any questions, please do not hesitate to call the undersigned Assistant U.S. Attorney.

Very truly yours,

ANDREW E. LELLING  
United States Attorney

By: /s/ Deepika Bains Shukla  
DEEPIKA BAINS SHUKLA  
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Enclosures